

US EPA ARCHIVE DOCUMENT



May 18, 2011

Mr. Stephen Hoffman
U.S. Environmental Protection Agency (5304P)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**RE: Gulf Power Company
Plant Lansing Smith
Southport, Florida
Coal Combustion Waste Impoundment, Round 5
Dam Assessment Report**

Dear Mr. Hoffman:

On or around April 20, 2011, Gulf Power Company ("Gulf Power") received the United States Environmental Protection Agency's ("EPA") Coal Combustion Waste Impoundment Round 5-Dam Assessment Report ("Final Report") for Gulf Power's Plant Lansing Smith ("Plant Smith") and accompanying cover letter, dated April 20, 2011. In its cover letter, EPA requested information on the implementation of recommendations listed in the Final Report. Please find below Gulf Power's response to EPA's request for information. For ease of reference, relevant EPA recommendations are repeated below followed by Gulf Power's response.

1.2.1 Recommendations Regarding the Structural Stability

An action plan should be developed to address surficial sloughing, rill erosion and sediment deposition along downstream slopes. Based on photographic documentation, the plan should consider changes in the drainage patterns to direct runoff back inside the embankments, the draft report included the above recommendations; subsequently GPC has developed and provided a copy of a site specific "Ash Pond Maintenance Plan" that incorporates the recommendations.

Response: As noted by EPA, Gulf Power has developed and provided a copy of a site specific “Ash Pond Maintenance Plan” that incorporates the recommendations.

1.2.2 Recommendations Regarding the Hydrologic/Hydraulic Safety

The amount of freeboard needs to be verified. Per information provided by GPC the freeboard is currently 2.5'. The available freeboard based on visual observations made during the site visit along portions of the dike system appears to be less than 1 foot.

Response: The crest elevation of most of the Plant Smith Coal Combustion Waste Impoundment (“impoundment”) is on the order of EL23. However, the northern end of what is referred to as the “East Cell” has a crest elevation between EL 20 and EL 21, particularly near the NE corner of the impoundment. The ash surface on the inboard side of the embankment in the area is at approximately EL 19. However, the operating level of the impoundment in this cell is on the order of EL 16, and is located at about the midsection of the cell. Thus, there is more freeboard present than visually appears. The water noted during the site visit is, in our opinion, standing water that remained after the heavy rains preceding the day of the assessment. Regardless, the elevations of water and ash within this section of the impoundment, as well as others, will be closely monitored during regular inspections to evaluate the availability of sufficient freeboard.

1.2.5 Recommendations Regarding the Field Observations

From the field observations the following issues were identified as needing to be addressed with routine maintenance:

- Surface sloughing has occurred in four areas along the northeast downstream slope of the embankment; one of those areas has been repaired with slush grouted rip-rap.
- There is evidence of small animal burrows along the downstream embankment;
- Widespread rill erosion, surface sloughing and sediment deposition has occurred along the downstream slope; and
- Irregular road along west dike downstream buttress with the rutting and small surface depressions holding water.

Response: As noted by EPA, Gulf Power has addressed these concerns, provided photo-documentation of the corrective actions taken, and prepared a site specific “Ash Pond Maintenance Plan” that incorporates these recommendations.

1.2.6 Recommendations Regarding the Maintenance and Methods of Operation

Vegetation should be cut or mowed on an as needed basis to prevent the establishment of large woody-stemmed vegetation. In the draft report there was a recommendation to develop a plan of action to handle the maintenance of surficial sloughing, crest depression and rill erosion when observed. Subsequent to this recommendation, GPC prepared a site specific "Ash Pond Maintenance Plan" that incorporates these recommendations.

Response: As noted by EPA, Gulf Power has developed and provided a copy of a site specific "Ash Pond Maintenance Plan" that incorporates the recommendations.

1.2.8 Recommendations Regarding Continued Safe and Reliable Operation

The draft report contained the following recommendations concerning safe operation:

- Develop an action plan to address surficial sloughing along the downstream slopes.
- Perform remediation along downstream slopes to address surficial sloughing
- Perform remediation along the slopes where erosion is occurring.
- Perform remediation along the crest where depressions are present.

Subsequently GPC addressed these concerns, photo-documented the corrections, and prepared a site specific "Ash Pond Maintenance Plan" that incorporates these recommendations.

- It is recommended that verification be made to ensure adequate freeboard (2.5-ft) exists along all points of the diked embankment system.

Response: As noted by EPA, Gulf Power has developed and provided a copy of a site specific "Ash Pond Maintenance Plan" that incorporates these recommendations. Please also refer to Gulf Power's response to Recommendation 1.2.2, regarding verification of freeboard.

If you should have any questions regarding this letter, please feel free to call Kevin Beaty at (850) 444-6551.

Sincerely,



James O. Vick

Director of Environmental Affairs

Enclosures

cc: Mike Markey – Gulf Power
Kevin Beaty – Gulf Power
Mindy Scanlon – Gulf Power